

## DEPARTMENT OF HEALTH SERVICES

714/744 P STREET  
SACRAMENTO, CA 95814

June 30, 1983

SFUND RECORDS CTR  
2385669

Mr. A. W. (Bill) Anderson, Jr.  
Environmental Programs Manager  
c/o Solar Turbines, Inc.  
P.O. Box 80966  
San Diego, CA 92138

Dear Mr. Anderson:

This letter is to confirm our conversation on June 2, 1983 regarding Solar Turbines' management of spent 1,1,1 trichloroethane solvent from its degreasing operation(s).

You stated that this solvent, when no longer usable as a degreaser by Solar Turbines, Inc., facilities (only), is hauled by company-owned trucks using an in-house "bill of lading" for all shipments which are sent to company's Harbor Drive facility (2200 Pacific Highway, San Diego, California). These drums are transported in accordance with regulations of the federal Department of Transportation and the California Highway Patrol. At the Harbor Drive facility, the entrained waste is removed from the degreaser, and the reconstituted 1,1,1, trichloroethane is shipped back to all Solar Turbine facilities for (re)use. This cycle is repeated over and over.

Since the producer and recycler of the spent 1,1,1 trichloroethane are the same firm, this material does not meet the definition of a recyclable material and need not be managed as a hazardous waste.

If I may be of any further help, please write or call at (916) 324-1792.

Sincerely,

Edward F. Pico  
Permits, Surveillance, and  
Enforcement Section  
Hazardous Waste Management Branch

Annual Reports For 1989

Sup Gear Report indicates Oily water  
(ie, dirty coolant) shipped to  
Solar HD.

However; HD report does not indicate

"receiving waste" as the material  
was sent by in house bill of lading  
per DHS letter June 30, 1983 and  
was not handled as Haz. waste.

ach